Impacts of the 2012 International Energy Conservation Code (IECC) on Wood Products

- The 2012 edition of its *International Energy Conservation Code* (IECC) was approved in October 2010. It is being promoted by the U.S. Department of Energy (DOE), as well as certain product interests, to become the principal energy code for use in residential construction.

- The code was approved -- over strenuous objections from numerous impacted parties -- mandating the use of foam board sheathing despite the existence of other products and systems capable of similar thermal performance. Similarly, arguments that certain building products such as windows were being held to a much less stringent standard were also ignored.

- The new code will cause a significant market loss of wood structural panels and other wood products, resulting in increased structural problems, increased CO_2 (greenhouse gas) emissions (due to greater energy consumption in producing alternative building materials), and will do nothing to sequester atmospheric carbon the way wood does.

- The new code provides four methods by which compliance can be achieved. The simplest compliance method is changed from requiring all materials to meet a minimum thermal performance value to a prescriptive method that essentially mandates the use of foam board insulation in certain climate zones. The alternative compliance options involve very complex calculations, and are not readily understood by the building industry, making it unlikely that the alternatives would be used.

- This effectively eliminates other products from the marketplace without any improvement in energy performance, providing a monopoly to manufacturers of foam sheathing, despite the availability of other products with similar or superior performance.

- Historically, the code has allowed various options for achieving required energy efficiency but did not seek to restrict competition among building products. Wood products can achieve any performance level established, but cannot compete when the use of a particular product is mandated by the code.

- Despite the thermal performance advantage wood-framing enjoys over some competing materials, wood cannot as easily accommodate the mandated foam sheathing. Therefore, builders will likely turn to alternative materials for the entire building framing system.

- Additionally, building code requirements to resist lateral forces (to ensure against collapse) will also be compromised. Unlike wood, foam board sheathing provides little resistance to any of these forces. Builders will be forced to find alternative bracing systems, moving completely away from wood. As a result, all structural wood products are at risk.

- At a time when the U.S. has committed to reducing its environmental impact, while maintaining well-paying U.S. jobs, the new energy code will have the opposite effect – forcing designers to use more carbon-intensive products and eliminating domestic wood product jobs nationwide.

- The 2012 energy code also holds glazing (i.e, windows) to a much less stringent energy performance standard, increasing the likelihood that more glazing will be used, which works against the goal of increased energy performance. With changes first introduced by DOE in 2006, the IECC effectively permits unlimited areas of glass in a wall, resulting in reduced energy performance.

Coalition for Fair Energy Codes

September 28, 2011

The Honorable Hugh Crawford
124 North Capitol Avenue
P.O. Box 30014
Lansing, MI 48909-7514

Re: H.B. 4561 and Energy Codes

Dear Chairman Crawford:

The House Regulatory Reform Committee will consider H.B. 4561, which makes several changes to the Single State Construction Code Act. This bill would, among other things, allow the state to update different elements of the construction codes on a three year or a six year cycle, as opposed to mandating that codes be updated every three years – regardless of whether the Department of Licensing and Regulation determines the updates to be necessary. **On behalf of the Coalition for Fair Energy Codes (CFEC), I am writing in support of this legislation as it will provide Michigan building officials with more flexibility in its adoption of building codes.**

CFEC is a group of of building product manufacturers and associations, the home building industry, and other parties interested in advancing fair and impartial treatment of all building products, including wood products, in the International Energy Conservation Code and in energy codes adopted by states. The U.S. wood products industry makes products essential to everyday life from a renewable resource that absorbs and sequesters carbon. The industry employs a third of a million people in the United States in well paying, rural jobs. In Michigan, the wood products industry employs over 13,000 individuals with an annual payroll of $433 milllion. The estimated state and local taxes paid by the wood products industry is $24 million annually.

As stated, CFEC supports the adoption of H.B. 4561. The current draft of the bill will allow the Director time to assess the efficacy and the cost impacts of new and technically challenging code requirements inherent in new editions of model codes. Expanding the time between Michigan code editions will allow a more thorough review and afford better performance to the citizens of Michigan.

Moreover, even as currently written, the Michigan Building Code, including energy code provisions, does not prevent improved performance or new and innovative materials. The Michigan Code is a minimum code and designers and owners will

continue to be free to exceed the minimum performance requirements. This should result in better performing buildings with a minimum cost impact in achieving that performance.

CFEC appreciates the opportunity to present our views regarding energy codes. Again, we urge you to favorably report H.B. 4561. If you have any questions, please do not hesitate to contact Kevin Callahan, Manager of Government Affairs, at 202.463.2433

Sincerely,

Eric Borsting
Executive Director, Coalition for Fair Energy Codes

cc: Representative Joseph Haveman
Members of the House Regulatory Reform Committee